

EXHIBIT B

From: Seidl, Christopher A.
Sent: Friday, June 5, 2020 2:34 PM
To: McCabe, William J. (Perkins Coie)
Cc: Westerlund, Jeanne A.; John W. Shaw Esq. (jshaw@shawkeller.com); Nathan R. Hoeschen - Shaw Keller LLP (nhoeschen@shawkeller.com); Moffa, Matthew (Perkins Coie); Gothing, Andrea L.; Linden, Benjamin C.; 'bfarnan@farnanlaw.com'
Subject: RE: VoiceAge EVS LLC v. HMD Global Oy, C.A. No. 19-1945-CFC (D. Del.)

Dear Bill,

We are surprised by your request for “non-public material” since HMD never requested any information from VoiceAge EVS prior to filing its motion to dismiss. In fact, the parties were in discussions for over 7 months, and HMD never raised any standing issue during those discussions or asked for any such information. The first we heard of any alleged standing issue was when HMD filed its motion. Your request for information (along with HMD’s request for “jurisdictional discovery”) at this stage appears to be nothing but a fishing expedition, and not an attempt to resolve the issue in good faith.

Your request for information is also not supported by Judge Connolly’s rules. Judge Connolly’s standard patent case scheduling order calls for the disclosure of “[a]ll documents evidencing ownership of the patent rights by the party asserting patent infringement” and “[a]ll agreements, including licenses, transferring an interest in any asserted patents” within 30 days of entry of a scheduling order. Thus, your request for information is premature.

We continue to maintain that HMD’s motion to dismiss is without merit, legally and factually. We will respond to HMD’s motion accordingly.

Regards,

Chris

From: McCabe, William J. (Perkins Coie) <WMcCabe@perkinscoie.com>
Sent: Wednesday, June 3, 2020 4:17 PM
To: Seidl, Christopher A. <CSeidl@RobinsKaplan.com>
Cc: Westerlund, Jeanne A. <JWesterlund@RobinsKaplan.com>; John W. Shaw Esq. (jshaw@shawkeller.com) <jshaw@shawkeller.com>; Nathan R. Hoeschen - Shaw Keller LLP (nhoeschen@shawkeller.com) <nhoeschen@shawkeller.com>; Moffa, Matthew (Perkins Coie) <MMoffa@perkinscoie.com>
Subject: [EXTERNAL] RE: VoiceAge EVS LLC v. HMD Global Oy, C.A. No. 19-1945-CFC (D. Del.)

Dear Chris:

We have reviewed your letter and the authorities cited. After review, we stand by the positions in our opening brief. To the extent there are non-public materials that you believe we should consider, please send them at your earliest convenience.

Regards,
Bill

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From: Seidl, Christopher A. <CSeidl@RobinsKaplan.com>

Sent: Tuesday, June 2, 2020 12:53 PM

To: McCabe, William J. (NYC) <WMcCabe@perkinscoie.com>

Cc: Westerlund, Jeanne A. <JWesterlund@RobinsKaplan.com>

Subject: VoiceAge EVS LLC v. HMD Global Oy, C.A. No. 19-1945-CFC (D. Del.)

Mr. McCabe:

Please see the attached letter.

Thank you,

Chris

Christopher A. Seidl

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